

1 STEVEN M. CAMPORA, SBN 110909

2 **DREYER BABICH BUCCOLA**

3 **WOOD CAMPORA, LLP**

4 20 Bicentennial Circle

5 Sacramento, CA 95826

6 Telephone: (916) 379-3500

7 Facsimile: (916) 379-3599

8 Attorneys for Creditors, Michael Ramey; Michael Ramey and Associates, Inc.; and Michael Ramey  
9 as Trustee of the Ramey Colby 2007 Trust.

10 ESTELA O. PINO, SBN 112975

11 **PINO & ASSOCIATES**

12 1520 Eureka Rd., Suite 101,

13 Roseville, CA 95661

14 Telephone: (916) 641-2288

15 Facsimile: (916) 244-0989

16 Attorneys for Dreyer Babich Buccola Wood Campora, LLP

17 THE UNITED STATES BANKRUPTCY COURT  
18 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA  
19 SAN FRANCISCO DIVISION

20 In re:

) Case Nos. 19-30088 (DM)

21 PG&E CORPORATION,

) Chapter 11

22 -and-

23 In re:

24 PACIFIC GAS AND ELECTRIC  
25 COMPANY,

26 Debtors.

) **REQUEST FOR RELIEF UPON DEFAULT**  
) **RE: MOTION FOR ORDER**  
) **AUTHORIZING WITHDRAWAL OF**  
) **COUNSEL TO: MICHAEL RAMEY;**  
) **MICHAEL RAMEY AND ASSOCIATES,**  
) **INC.; AND MICHAEL RAMEY AS**  
) **TRUSTEE OF THE RAMEY COLBY 2007**  
) **TRUST**

27 ☐ Affects PG&E Corporation

28 ☐ Affects Pacific Gas and Electric  
Company

☒ Affects both Debtors

) JUDGE: Hon. Dennis Montali

29 \* All papers shall be filed in the lead case, No.  
30 19-30088(DM)

) [Re: Dkt. No. 12349, 12350, 12351, & 12370]

1 Dreyer Babich Buccola Wood Campora, LLP (hereinafter referred to as "Dreyer Babich") by  
2 and through its attorneys of record, respectfully submits this Request for Relief upon Default re:  
3 Motion for Order Authorizing Withdrawal of Counsel To: Michael Ramey; Michael Ramey and  
4 Associates, Inc.; and Michael Ramey as Trustee of the Ramey Colby 2007 Trust (hereinafter  
5 referred to as the "Request For Relief Upon Default ").  
6

7  
8 **REQUEST FOR RELIEF UPON DEFAULT**

9 B.L.R. 9014(b)(4), styled "**Request Upon Default**" (emphasis found in original), provides  
10 that,

11  
12 [w]hen no objection or request for a hearing has been filed or served within the time  
13 provided in B.L.R. 9014-1(b)(3)(A), the initiating party may request relief by default by  
14 submitting a request for entry of an order by default and a proposed order.

15 Accordingly, Dreyer Babich, by and through its counsel, hereby requests that the Court enter  
16 an order by default on its Motion for Order Authorizing Withdrawal of Counsel To: Michael Ramey;  
17 Michael Ramey and Associates, Inc.; and Michael Ramey as Trustee of the Ramey Colby 2007 Trust  
18 (hereinafter referred to as the "Motion") (ECF 12349).

19 **RELIEF REQUESTED**

20 Pursuant to the Motion, Dreyer Babich seeks an order authorizing Dreyer Babich to  
21 withdraw as counsel of record for Michael Ramey; Michael Ramey and Associates, Inc.; and  
22 Michael Ramey as Trustee of the Ramey Colby 2007 Trust (hereinafter collectively referred to as  
23 the "Creditors").  
24

25  
26 **NOTICE AND SERVICE**

27 On May 10, 2022, the Motion; the Notice and Opportunity for Hearing on Motion for Order  
28 Authorizing Withdrawal of Counsel To: Michael Ramey; Michael Ramey and Associates, Inc.; and

1 Michael Ramey as Trustee of the Ramey Colby 2007 Trust (hereinafter referred to as the "Notice  
2 and Opportunity of Hearing") (ECF 12350); and the Declaration of Steve M. Campora in Support of  
3 Motion for Order Authorizing Withdrawal of Counsel To: Michael Ramey; Michael Ramey and  
4 Associates, Inc.; and Michael Ramey as Trustee of the Ramey Colby 2007 Trust (hereinafter  
5 referred to as the "Declaration of Steve Campora") (ECF12351), were filed with the Court in  
6 connection with the above referenced matter.  
7

8  
9 The Notice and Opportunity of Hearing provided that the deadline to file and serve a written  
10 response or request for a hearing with regards to the Motion was twenty-one (21) days from the date  
11 of mailing of the Notice and Opportunity of Hearing.  
12

13 On May 10, 2022, all three (3) documents - the Motion, the Notice and Opportunity of  
14 Hearing, and the Declaration of Steve Campora were served on the Creditors, via United States  
15 Mail. *See Proof of Service via United States Mail (ECF 12370).*  
16

17 The deadline to file a response or an opposition to the Motion has passed, and no opposition  
18 or request for hearing in connection with the Motion has been filed with the Court or received by  
19 Dreyer Babich and/or its counsel.  
20

21 **WHEREFORE**, Dreyer Babich, by and through its counsel, hereby respectfully requests  
22 that the Court enter the proposed order, lodged concurrently herewith, granting the Motion for the  
23 reasons set forth therein.  
24

25 Date: June 8, 2022

Respectfully submitted,

**PINO & ASSOCIATES**

26  
27 By: 

28 Estela O. Pino, Counsel for  
Dreyer Babich Buccola Wood Campora, LLP

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2  
3 **DECLARATION OF NO OPPOSITION RECEIVED**

4 I, Estela O. Pino, declare as follows in support of the Request For Relief Upon Default:

5  
6 1. I am an individual over 18 years of age.

7 2. I have personal knowledge of the matters set forth herein and if called upon to testify,  
8 I could do so truthfully and competently.

9  
10 3. I am an attorney licensed to practice law in the State of California and I am admitted  
11 to practice before this Court.

12  
13 4. I am the principal of the law firm of Pino & Associates, which maintains its offices at  
14 1520 Eureka Rd., Suite 101, Roseville, CA 95661.

15 5. Pino & Associates represents Dreyer Babich in connection with the Motion.

16  
17 6. Pino & Associates has not received any opposition or response to the Motion.

18  
19 7. I have reviewed the docket of the above-captioned bankruptcy cases and have  
20 determined that no opposition or response to the Motion has been filed.

21 8. Based on the foregoing and pursuant to B.L.R. 9014-1(3)(A), a hearing has not been  
22 requested and is not required.

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1           9.       A proposed order will be lodged concurrently as provide for in B.L.R. 9014-  
2 1(b)(3)(A).  
3

4           I declare under penalty of perjury under the laws of the United States of America, that the  
5 foregoing is true and correct.

6           Executed on this 8<sup>th</sup> day of June, 2022, at Roseville, Placer County, California.  
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8  
9  
10   
11 Estela O. Pino